

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

DAVITA M. KEY,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. 2:19-CV-767-ECM
	)	
HYUNDAI MOTOR	)	
MANUFACTURING, ALABAMA,	)	
LLC; HYUNDAI ENG AMERICA,	)	
INC.; and DYNAMIC SECURITY,	)	
INC.	)	
	)	
Defendants.	)	

---

**PLAINTIFF’S EXHIBIT LIST**

---

COMES NOW the Plaintiff and identifies the following exhibits for the trial of the above styled matter.

A. Exhibits Plaintiff Expects to Offer at Trial:

1. Dynamic Security Paycheck (Key 001)
2. Photos of Plaintiff’s Hairstyle (Key 271-276)
3. HMMA Service Contract (HMMA 013-076)
4. HMMA Mailroom Site Map (HMMA 077)
5. Appearance Standards for Security Personnel (HEA 001-003)

---

Plaintiff’s Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM

6. Appearance Standards for Security Contractors (HEA 163-166)
7. HEA Organization Chart (HEA 167)
8. HMMA Mailroom Duties and Responsibilities (HEA 194-195)
9. Mailroom Employee Uniform Photo (HEA 205)
10. Email Between Robinson and Key Re: Interview (Key 1049-1050)
11. Email Between Robinson and Key Re: Interview Time (Key 251-253)
12. Email from Robinson to Key Offering Position (Key 254-255)
13. Key Statement to Unemployment (S0093-00096)
14. Dynamic Unemployment Denial (S0049)
15. September/October 2017 Email between Gloria Robinson, Jazemen Baxter, and Cassandra Williams RE: styled hair (HEA 206-212)
16. E-mail 8/2/17 between Cureton, Robinson and others asking Key not to return to site for hair (Dynamic-Key 31)
17. Key Handwritten Internal Complaint (Dynamic-Key 32)
18. Robinson Removal Memorandum (Dynamic-Key 33-35)
19. Dynamic Statements RE: Key 8/14/17 (Dynamic-Key 36-37)
20. E-mail 8/8/17 Between Cureton, Spires, and others with Key Internal Complaint (Dynamic-Key 054-055)
21. E-mail 8/8/17 Between Cureton and HR with Statement Attached (Dynamic-Key 056-057)
22. Key 8/8/17 Statement to Dynamic Security HR (Dynamic-Key 058-063)

- 23.Key Removal from Hyundai – Discipline Report (Dynamic-Key 064)
- 24.Latunya Howell Statement (Dynamic-Key 067)
- 25.E-mail 8/7/17 Between Cureton, Spires, others Notifying of Threats to Sue (Dynamic-Key 069-070)
- 26.E-mail 8/1/17 between Cureton, Robinson, Spires, and others Regarding Reason for Removal (Dynamic-Key 073-77)
- 27.E-mail 8/1/17 Cureton, Williams, and Others (HEA 168-172)
- 28.E-mail between Robinson, Hargrove and others Concerning Pregnancy and Hair including Return to Work Note (Dynamic-Key 078-081)
- 29.E-mail Dynamic Transmittal to HR with Complaint (Dynamic-Key 082-084)
- 30.E-mail 7/31/17 Robinson to Hargrove and others Concerning Recourse for Not Reporting Pregnancy (Dynamic-Key 085-087)
- 31.E-mail 8/11/17 Notice of EEOC Charge to Dynamic (Dynamic-Key 3224-3226)
- 32.E-mail 8/11/17 Spires, Cureton, and others Concerning EEOC Response (Dynamic-Key 3227-3230)
- 33.E-mail 8/11/17 Spires, Cureton, and others Concerning Work Verification of Key for Government Benefits (Dynamic-Key 3233-3239)
- 34.E-mail 8/22/17 Spires, Cureton and Others Concerning Unemployment (Dynamic-Key 3241-3245)
- 35.E-mail 8/29/17 Spires, Cureton and Others Concerning Unemployment Rebuttal (Dynamic-Key 3248-3251)

36.E-mail 11/13/18 Williams, Spires, and others Concerning Dynamic EEOC Charge and Notice of HMMA Charge (HEA 173-176)

37.E-mail 11/13/18 Williams, Spires, and others Concerning Dynamic EEOC Charge and Notice of HMMA Charge (Dynamic-Key 3280-3282)

38.Assignment Refusal Forms (Dynamic-Key 029-030)

B. Exhibits the Plaintiff May Offer at Trial:

1. Various E-mails for Job Searches (Key 131-248)
2. HMMA Safety Manual (Key 277-331)
3. Dynamic Security Officer's Handbook (Dynamic-Key 1-27)
4. Hyundai Employee Handbook (HEA 4-48)
5. 2017 Tax Return (Key 386-390)
6. 2018 Tax Return (Key 391-394)
7. 2019 Tax Return (Key 395-401)
8. 2020 Tax Return (Key 402-406)
9. 2021 W-2 Kelly Services (Key 407)
- 10.2021 W-2 Pike Road (Key 408)
- 11.HMMA EEOC Determination (F001-002)
- 12.EEOC Notice of Failed Conciliation (F003-004)
- 13.HMMA Notice of Right to Sue (F005)
- 14.HMMA EEOC Charge and Intake Questionnaire (F007-016)
- 15.EEOC Charge Dynamic Security (Dynamic-Key 046-047)

- 16.Dynamic Security Notice of Right to Sue (Dynamic-Key 044)
- 17.EEOC Letter to HMMA Finding Retaliation (F022)
- 18.HMMA Position Statement (F027-48)
- 19.Dynamic Security Position Statement (HEA 053-056)
- 20.Various E-mails between Plaintiff and EEOC investigators concerning pending charge (Key 093-113)
- 21.HMMA Handbook Excerpts / Team Member Conduct (HMMA 001-002)
- 22.Prior EEOC Charges (HMMA 078-134)
- 23.HMMA Contractor Safety Book (HMMA 135-235)
- 24.E-mails and Letter Regarding HMMA Notice of Charge and HEA Indemnification Requirement (HMMA 236-245)
- 25.E-mails Regarding Dynamic Charge to HEA (HMMA 246-249)
- 26.E-mails Regarding Dynamic Charge Status to HEA (HMMA 250-251).
- 27.Security Detail Reports dated 7/19/17, 7/21/17, 7/24/17, 7/31/17, 8/1/17, 8/29/17 (HMMA 355-356, 360-362, 368-371, 393-398, 467-471)
- 28.HMMA Teammember Handbook (HMMA 511-542)
- 29.HEA Letter Extending Service Contract (HMMA 543)
- 30.Cassandra Williams Employment Agreement with HEA (HEA196-202)
- 31.E-mail between Williams and Yu RE: appearance standards and meeting with contractor (HEA 213-214)

- 32.E-mail Between Whitehead and Dynamic Concerning Cause Finding for HMMA (HEA 215-216)
- 33.E-mail dated 5/8/19 between Whitehead and Williams regarding Declaration (HEA 217-218)
- 34.Security Invoices and Subcontractor Request for Payment 8/2/17 (HEA 219-224)
- 35.HMMA Policy Regarding Appearance 2004 (HEA 247-251)
- 36.Unexecuted Contract for Services Between Dynamic and HEA (HEA 252-278)
- 37.Dynamic Security Harassment Powerpoint (Dynamic-Key 093-111)
- 38.Dynamic Security EEOC Powerpoint (Dynamic-Key 112-139)
- 39.Dynamic Security Rules and Regulations (Dynamic-Key 38-39)
- 40.Dynamic Security Discipline Guidelines (Dynamic-Key 40)
- 41.Dynamic Security Harassment Policy (Dynamic-Key 42)
- 42.Key Acknowledgment of Handbook Receipt (Dynamic-Key 41)
- 43.E-mail 8/1/1 Cureton to Dynamic Security Regarding Key Internal Complaint (Dynamic-Key 143-144)
- 44.E-mail 8/10/17 Between Cureton, Spires and others Regarding Key current complaint status and placements (Dynamic-Key 3220-3223)
- 45.E-mail 8/29/17 Cureton RE: Unemployment Rebuttal (Dynamic-Key 140-141)
- 46.E-mail Re: Difficulty Filling Mailroom Positions (Dynamic-Key 145)
- 47.Dynamic Security AA&EEOC Policies (Dynamic-Key 270-283)

48. Security Officer Job Description (Dynamic-Key 284)

49. E-mail 12/11/16 Between Williams and Hargrove Concerning Pay Raises (Dynamic-Key 289-293)

50. Gloria Robinson Resume (Dynamic-Key 428-431)

51. Gloria Robinson Employment Discipline or Complaints (Dynamic-Key 464-468)

52. Any document necessary for rebuttal and/or impeachment

53. Without conceding the admissibility of any exhibit identified on the Defendants' exhibit lists or waiving any objections, Plaintiff reserves the right to use any non-objectionable exhibit identified on the Defendants' exhibit lists.

C. Demonstratives the Plaintiff May Use:

1. Timeline of Events
2. List of Key Names and Those Persons' Positions with HMMA, HEA, and/or Dynamic Security
3. Lost Wages Chart
4. Slide Deck for Opening/Closing Arguments

	Respectfully submitted,
	Attorneys for Plaintiff
	<u>/s/ Heather Leonard</u>
	Heather Newsom Leonard
	ASB-1152-061H
OF COUNSEL:	
Heather Leonard, P.C.	
2105 Devereaux Cir., Suite 111	

---

Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
 United States District Court for the Middle District of Alabama  
 Civil Action 2:19-CV-767-ECM

Birmingham, AL 35243	
Phone: (205) 977-5421	
<a href="mailto:heather@heatherleonardpc.com">heather@heatherleonardpc.com</a>	
	<u>/s/ Leslie A. Palmer.</u>
	ASB-0436-L40P
OF COUNSEL:	
Palmer Law, LLC	
104 23rd Street South, Suite 100	
Birmingham, AL 35233	
(205) 285-3050	
<a href="mailto:leslie@palmerlegalservices.com">leslie@palmerlegalservices.com</a>	

### **Certificate of Service**

I hereby certify that I have filed the foregoing on the Court's CM/ECF electronic filing system which will provide notice to all counsel of record on this 26th day of January, 2023.

Wesley C. Redmond  
Susan W. Bullock  
FordHarrison LLC  
420 20th Street North, Suite 2560  
Birmingham, AL 35203  
[wredmond@fordharrison.com](mailto:wredmond@fordharrison.com)  
[sbullock@fordharrison.com](mailto:sbullock@fordharrison.com)  
Phone: (205) 244-5905  
Counsel for Dynamic Security, Inc.

David J. Middlebrooks  
Whitney R. Brown  
Lehr Middlebrooks Vreeland & Thompson, P.C.  
PO Box 11945  
Birmingham, AL 35202  
[dmiddlebrooks@lehrmiddlebrooks.com](mailto:dmiddlebrooks@lehrmiddlebrooks.com)

---

Plaintiff's Witness List  
*Key v. Hyundai Motor Manufacturing, et al*  
United States District Court for the Middle District of Alabama  
Civil Action 2:19-CV-767-ECM



[wbrown@lehrmiddlebrooks.com](mailto:wbrown@lehrmiddlebrooks.com)

Phone: (205) 326-3002

Counsel for Hyundai Motor Manufacturing Alabama, LLC

T. Matthew Miller

Cortlin Bond

Sarahanne Vaughan

Bradley, Arant, Boult Cummings, LLP

One Federal Place

1819 5th Avenue North

Birmingham, AL 35203

[mmiller@bradley.com](mailto:mmiller@bradley.com)

[cbond@bradley.com](mailto:cbond@bradley.com)

[svaughan@bradley.com](mailto:svaughan@bradley.com)

Phone: (205) 521-8000

Counsel for Hyundai ENG America, Inc.

/s/ Leslie A. Palmer

OF COUNSEL